

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

May 29, 2009

Anna Burger, Treasurer
Service Employees International Union
Committee on Political Education (SEIU COPE)
1800 Massachusetts Ave NW
Washington, DC 20036

Response Due Date: June 29, 2009

Identification Number:

C00004036

Reference:

Amended 12 Day Pre-General Report (10/1/08-10/15/08), received

10/31/08

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 5 items:

- 1. Your amended report discloses additional receipts totaling \$572,232.48 on Line(s) 11(a)(ii), 15 and 17 of the Detailed Summary Page that were not disclosed on your original report. Please provide clarifying information as to why this activity was not disclosed on your original report. 11 CFR §104.3
- 2. Schedule E for Line 24 of your report discloses MEMO entries for apparent independent expenditures totaling \$377,673 from "MNP Partners Inc." during this reporting period. However, there is \$134,613 in incurred debts on Schedule D supporting Line 10. Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR §104.11. Subsequently, when the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable. Please amend your report to clarify this apparent discrepancy.